

McIntosh, Scott

From: McIntosh, Scott
Sent: Friday, January 05, 2007 3:57 PM
To: Jon Givens
Cc: Jana Vanderbrink; Dienelt, John; McIntosh, Scott
Subject: Markup of Draft Joint Memorandum

Attachments: Document.pdf



Document.pdf (218 KB)

Jon,

I did not receive a response to my email from yesterday regarding the Joint Memorandum, including the question regarding the meaning of the phrase "Since the Court is not addressing the piercing issue," in Section II of your draft.

However, in the interest of facilitating the Joint Memorandum, which is due today, I am attaching a markup that either revises the "joint" sections to be neutral, or sets forth the arguments of each side, where there is a dispute.

Please let me know whether you will agree to submission of a Joint Memorandum, with the proposed revisions on the attached document, together with our insert for Section I(B)(2), plus any changes you plan to make to Section I(B)(1).

Regards,
Scott

Scott McIntosh

DLA Piper US LLP
1200 Nineteenth Street, NW
Washington, DC 20036-2412

202.861.3979 T
202.689.7417 F
scott.mcintosh@dlapiper.com